



THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

announces a

45 DAY PUBLIC COMMENT PERIOD

regarding the

STATEMENT OF BASIS

for the proposed cleanup of Contaminated Ground Water and Soil at the

TECHALLOY COMPANY, INC.

Union, Illinois

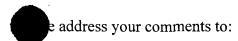
Techalloy Company, Inc. is performing environmental corrective action at their facility in Union, Illinois. The corrective action is performed under the authority of the Resource Conservation Recovery Act (RCRA) and in redance with a United States Environmental Protection Agency (U.S. EPA) Consent Order. U.S. EPA prepared tement of Basis summarizing Techalloy Company Inc.'s investigation into the extent of contamination and Corrective Measures Study (CMS) to evaluate viable remedies. The report also specifies the cleanup proposed by U.S. EPA.

The cleanup proposed by U.S. EPA includes:

- On-site treatment of soils contaminated with metals. The soils would be remediated using soil stabilization technology
- Remediation of volatile organic compounds in the soil and groundwater by using an air sparging/soil vapor extraction system
- ► Continued operation of the groundwater recovery system near Union Road, with an additional recovery well to also be installed
- Groundwater monitoring to assess the effects of the corrective measures
- ► Institutional controls (facility deed restriction, restriction of water-well drilling permits)

Although a public meeting is not planned at this time, U.S. EPA will consider holding a meeting at a future date if requested. The general public has 45 days in which to review the documents relative to this proposal and provide comments to U.S. EPA. The 45 day Public Comment Period begins January?, 1998, and ends February?, 1998. Comments must be in writing and either postmarked or e-mailed by **February?**, 1998.

Documents are available for review in the information repository, Marengo City Library, 200 South State Street, Marengo, Illinois.



Gordon Blum
Office of Public Affairs
U.S. EPA (P-19J)
77 W. Jackson Boulevard
Chicago, IL 60604

E-mail: blum.gordon@epamail.epa.gov

Or for more information, call William Buller at (312) 886-4568, or toll-free 1-800-621-8431

United States Environmental Protection Agency

FACT SHEET FOR STATEMENT OF BASIS

TECHALLOY COMPANY, INC. UNION, ILLINOIS

INTRODUCTION

Techalloy Company, Inc. is performing environmental corrective action at their Facility located at the corner of Olson and Jefferson Roads in Union, Illinois. The corrective action is performed under the authority of the Resource Conservation Recovery Act (RCRA) and in accordance with a United States Environmental Protection Agency (U.S. EPA) Consent Order. The Statement of Basis prepared by U.S. EPA provides a summary of Techalloy's investigation to define the nature and extent of contamination, Techalloy's study to evaluate viable remedies for the facility, and also specifies the corrective measures (overall remedy) proposed by U.S. EPA to clean up the facility. The Statement of Basis is presented to the public for review and comment. U.S. EPA may modify the proposed remedy based on the public comments, therefore public comment is encouraged. Written comments should be sent to:

Gordon Blum
Community Relations Coordinator
U.S. Environmental Protection Agency
77 West Jackson boulevard, P-19J
Chicago, Illinois 60604
E MAIL blum.gordon@epamail.epa.gov

You may also call William Buller, U.S. EPA Project Coordinator, at (312) 886-4568 for questions concerning the site, or to

provide comment.

NATURE AND EXTENT OF CONTAMINATION

The RCRA Facility Investigation delineated several areas at the plant site where soils are contaminated with metal constituents and volatile organic compounds. The investigation also revealed extensive contamination of the underlying shallow sand and gravel aquifer by volatile organic compounds. An area of contaminated groundwater extends from the facility plant site northwestward to the open field beyond Union Road.

INTERIM CORRECTIVE MEASURES

Certain corrective measures were initiated at an early stage in the corrective action process to stabilize the site and provide immediate protection as needed.

To prevent consumption of the contaminated groundwater, a private well sampling program was initiated in 1993. Residential wells potentially impacted by the contaminated groundwater have been sampled and analyzed on a semi-annual basis. Except for one well which was located at the central area of groundwater contamination, no appreciable contamination attributable to the facility has been found in residential wells. The property with the contaminated well was provided with a well that draws water from a deeper aquifer.

To minimize further migration of the contaminated groundwater, a groundwater recovery system (pump and treat system) was installed near Union Road, and has been operational since December 1996. The recovery system consists of a production well (extraction well), and a air stripping treatment system that removes the volatile organic compounds from the water. The treated water is discharged to the Kishwaukee River under a State permit, and the volatile compounds that are stripped from the water are discharged to the atmosphere under a State construction/operating permit. To expand the degree of containment, the recovery system is to be upgraded by installing an additional extraction well. The upgrade is expected to be completed by the Fall of 1998.

REMEDY PROPOSED BY U.S. EPA

U.S. EPA proposes to clean up the facility by treating soils contaminated with metals by stabilization technology, treating soil and groundwater contaminated with volatile organic compounds by air sparging/soil vapor extraction technology, and operation of an existing groundwater recovery system. Institutional controls and monitoring are also included in the remedy. The remedial activities will be performed in accordance with a Health and Safety Plan.

Soils with metal concentrations exceeding cleanup standards would be excavated, and then treated by a stabilization process to convert the metals to less soluble, leachable, and toxic forms, and returned to the excavation. Estimated volume of soil to be treated is 8,500 cubic yards. The entire treated area would be capped with asphalt.

To remediate soil and groundwater contaminated with volatile organic compounds, air sparging/soil vapor extraction technology is proposed. In this technology, air is injected into the subsurface causing the volatile organic compounds to vaporize. The organic vapors are removed by vapor extraction wells. Air emissions of the organic vapors would be controlled as needed. The air sparging/soil vapor extraction system is to be applied to a highly contaminated area at the facility of about one-half acre size. The air sparging/soil vapor extraction operation is expected to reduce a major part of the volatile organic compound source material at the facility and expedite restoration of the aquifer. However, full remediation of the aquifer is expected to be long term and may take thirty years or more.

Additional groundwater remediation is provided by an existing groundwater recovery system located at Union Road. This system serves a dual purpose in that it withdraws contaminated groundwater and removes the contaminants by treatment, and also acts as a barrier to further contaminant migration by drawing the contaminated water to the well. As noted above, the system is to be upgraded to provide better containment.

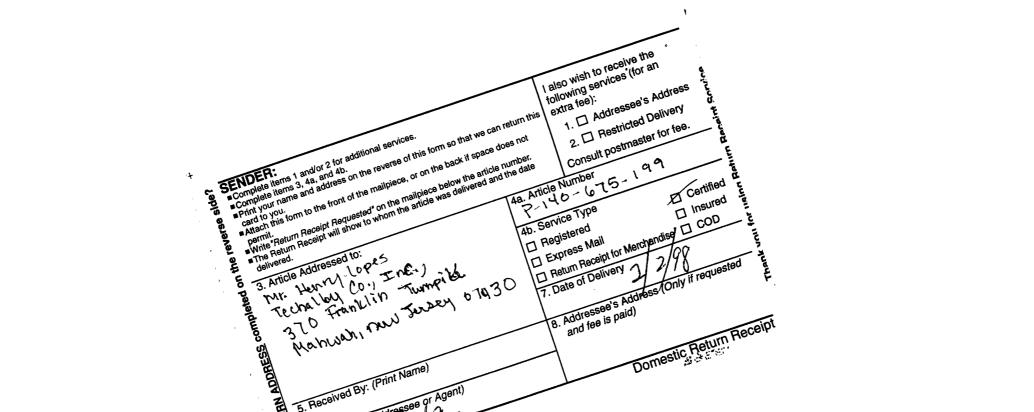
A groundwater monitoring program will be implemented to assess the effects of the corrective measures. Currently, a monitoring well set located near the contaminant migration end point is sampled and analyzed semi-annually to monitor this critical area of the aquifer. Institutional controls (regulatory or legal restraints) are also part of the overall remedy. These controls include the current restriction on water well permits which requires treatment of water withdrawn from the contaminated area; and a deed restriction that limits use of the plant site to industrial use only. A security fence encompasses the plant site.

INFORMATION REPOSITORY

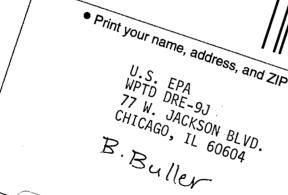
An information repository for the facility has been established at the Marengo City Library, 200 South State Street, Marengo, Illinois. The repository includes the following documents:

- Administrative Order on Consent, January 27, 1993
- Statement of Basis U.S. EPA
- Private Well Sampling Plan
- Techalloy Company Inc. Groundwater Treatment System Interim Measures, Union, Illinois
- RCRA Facility Investigation Final Report Techalloy Company, Inc., Union, Illinois
- Corrective Measures Study Report Techalloy Company, Inc., Union, Illinois
- Future Land Use Determination for Implementing a Corrective Measures Study

The above documents are also available at U.S. EPA's RCRA Record Center at the Metcalfe building, 77 West Jackson Boulevard, Chicago, Illinois. The public is encouraged to review the Facility Reports to gain a more comprehensive understanding of the site.

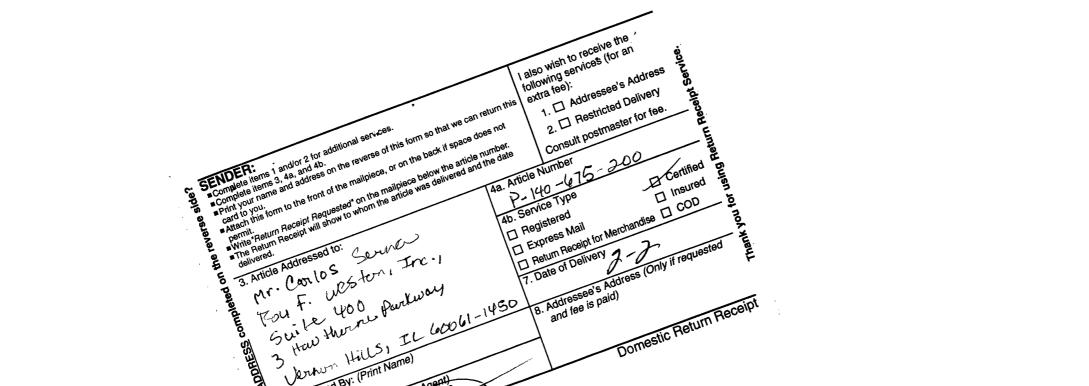


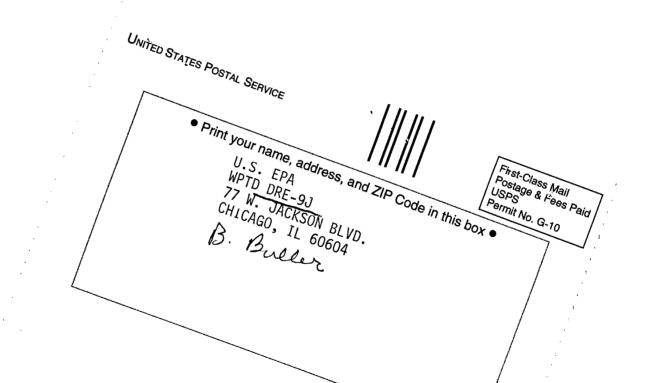




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- 6. Save this receipt and present it if you make an inquiry.

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DRE-9J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Henry Lopes Techalloy Company, Inc. 370 Franklin Turnpike, Mahwah, New Jersey 07430

Mr. Carlos Serna Roy F. Weston, Inc. Suite 400 3 Hawthorne Parkway Vernon Hills, Illinois 60061-1450

Re: Statement of Basis/Fact Sheet Techalloy Company, Inc. Union, Illinois ILD 005 178 975

Dear Mr. Lopes and Mr. Serna:

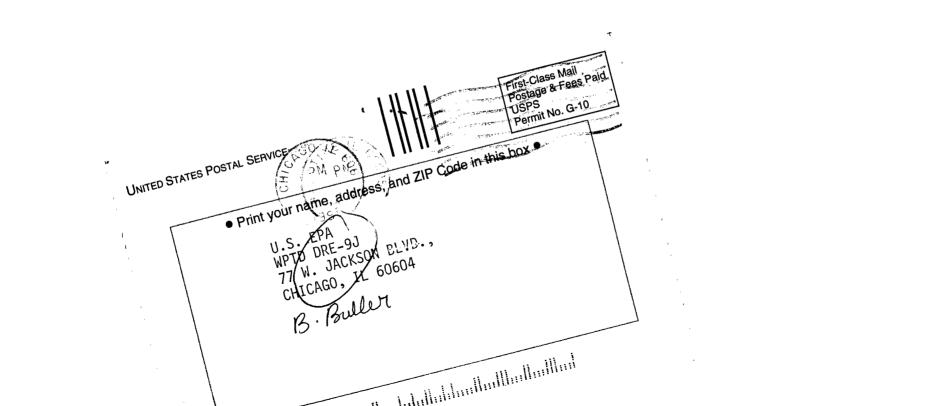
Please find enclosed a copy of the Statement of Basis/Fact Sheet (SB/FS) which presents the Agency's proposed remedy for the Techalloy facility. An information repository for the facility which contains the SB/FS and Techalloy's reports has been established at the Marengo Public Library, 200 South State Street, Marengo, Illinois. The public comment period for the Statement of Basis extends from February 10 to March 30. You may send written comments to:

Gordon Blum Community Relations Coordinator U.S. Environmental Protection Agency P-19J 77 West Jackson Boulevard Chicago, Illinois 60604 If you have any questions please call me at (312) 886-4568. Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (without enclosure)
Jacqueline Kline, ORC (without enclosure)



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gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article RETURN RECEIPT REQUESTED adjacent to the number. 4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse RESTRICTED DELIVERY on the front of the article.

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JAN 30 1998

DRE-9J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Dr. Cynthia L. Skrukrud Executive Director McHenry County Defenders 132 Cass Street Woodstock, Illinois 60098

Re: Statement of Basis/Fact Sheet Techalloy Company Inc. Union, Illinois ILD 005 178 975

Dear Dr. Skrukrud:

Techalloy Company is performing corrective action for soil and groundwater contamination at their facility in accordance with a United States Environmental Protection Agency (U.S. EPA) Administrative Order on Consent. Please find enclosed a copy of U.S. EPA's Statement of Basis/Fact Sheet (SB/FS) for the Techalloy facility. The SB/FS summarizes the information contained in the RCRA Facility Investigation and Corrective Measures Study Reports prepared by Techalloy Company, and also specifies the corrective action remedy proposed by U.S. EPA to clean up the Techalloy site.

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Gordon Blum
Community Relations Coordinator
U. S. Environmental Protection Agency P-19J
77 West Jackson Boulevard
Chicago, Illinois 60604
E MAIL blum.gordon@epamail.epa.gov

If you have any questions or wish to discuss the proposed remedy, please call me at (312) 886-4568.

Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (without enclosure)

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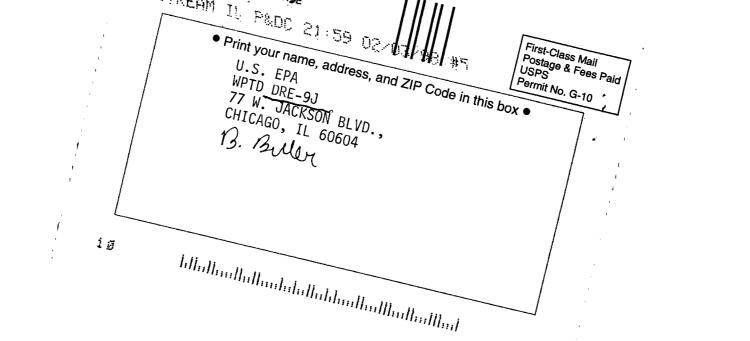
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JAN 30 1998

DRE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Non-responsive

Re: Statement of Basis/Fact Sheet Techalloy Company Inc. Union, Illinois ILD 005 178 975

Dear Non-responsive

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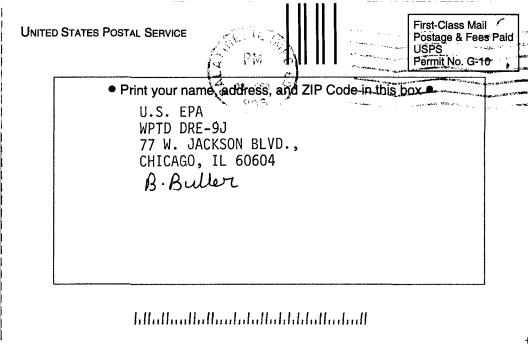
If you have any questions or wish to discuss the proposed remedy,

please call me at (312) 886-4568. Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (without enclosure)



on the reverse side?	Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so that we card to you. Attach this form to the front of the mailpiece, or on the back if space permit. Write "Return Receipt Requested" on the mailpiece below the article. The Return Receipt will show to whom the article was delivered and delivered.	I also wish to receive the following services (for an extra fee): 1. Addressee's Address 2. Restricted Delivery Consult postmaster for fee.		
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- 4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse RESTRICTED DELIVERY on the front of the article.
- 5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
- 6. Save this receipt and present it if you make an inquiry.

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DRE-9J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Patrick McNulty Director of Environmental Health McHenry County Health Department 2200 N. Seminary Avenue Woodstock, Illinois 60098

Re: Statement of Basis/Fact Sheet Techalloy Company Inc. Union, Illinois ILD 005 178 975

Dear Mr. McNulty:

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If you have any questions or wish to discuss the proposed remedy, please call me at (312) 886-4568.

Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (without enclosure)

JAN 30 1998

DRE-9J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jerry Blade U.S. Fish & Wildlife Service 4469 48th Avenue Court Rock Island, Illinois 61201

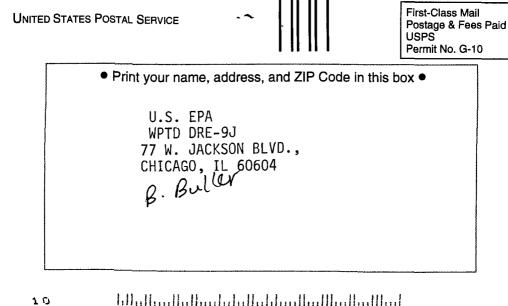
Re: Statement of Basis/Fact Sheet Techalloy Company Inc. Union, Illinois ILD 005 178 975

Dear Mr. Blade:

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77 West Jackson Boulevard
Chicago, Illinois 60604
E MAIL blum.gordon@epamail.epa.gov



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addressee, endorse RESTRICTED DELIVERY on the front of the article. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.

6. Save this receipt and present it if you make an inquiry.

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US Postal Service

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Postmark or Date 30

If you have any questions or wish to discuss the proposed remedy, please call me at (312) 886-4568.

Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (without enclosure)

DRE-9J

Mr. Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62794-9276

Re: Statement of Basis/Fact Sheet Techalloy Company, Inc. Union, Illinois ILD 005 178 975

Dear Mr. Bakowski:

Please find enclosed two copies of the Statement of Basis/Fact Sheet (SB/FS) which presents the Agency's proposed remedy to clean up the Techalloy facility at Union, Illinois. The SB/FS, and Techalloy's reports for the RCRA Facility Investigation and Corrective Measures Study are included in an information repository established at the Marengo Public Library, 200 South State Street, Marengo, Illinois.

A draft SB was previously provided to Kevin Lesko of your staff. Since no comments concerning the SB were received from the State, it is assumed you are in general agreement with the document. A public comment period for the SB has been opened which extends from February 10 to March 30. Should you have any comments, you may send written comments to me (mail code DRE-9J), or you may call me at (312) 886-4568.

Sincerely,

William Buller, Project Coordinator Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxic Division MI/WI Section

Enclosure

bcc: LaDawn Whitehead, PMB (Without enclosure) Jacqueline Kline, ORC (without enclosure)

DRE-9J

Hello:

This letter is to inform you that the U.S. Environmental Protection Agency (U.S. EPA) is proposing a remedy for the cleanup of soil and groundwater contamination at the Techalloy Company, Inc. facility, located at the corner of Olson and Jefferson Roads in Union, Illinois. The final remedy we select will be done only after a 45 day public manner period has expired and we have reviewed any comments we receive.

The Techalloy facility is comprised of a five acre fenced in plant area and an adjacent additional 29 acres of agricultural land. The facility produces steel wire of varying strengths and diameters. A variety of cleaners, coating solutions, dyes, and rinses have been utilized to produce the wire product.

A **Statement of Basis** summarizing the results of a Resource, Conservation and Recovery Act (RCRA) Facility Investigation (RFI) and Corrective Measures Study (CMS), along with other pertinent information, have been d in the information repository at the Marengo City Library, 200 South State Street, Marengo, Illinois. U.S. encourages you to review these documents in order to gain a better understanding of the activities taking place, and to give you a basis for making any comments regarding the proposed remedy.

Before arriving at the following cleanup recommendations, several remedy options were considered, using nine criteria. U.S. EPA proposes the following cleanup actions:

- On-site treatment of soils contaminated with metals
- Application of an air sparging/soil vapor extraction system to treat soils and groundwater contaminated with volatile organic compounds
- Continued operation of the current groundwater recovery system, with an additional recovery well to also be installed
- Institutional controls to prevent contact with contaminants
- Groundwater monitoring to assess the effectiveness of corrective measures

Although a public meeting is not scheduled at this time, U.S. EPA will consider holding one if sufficient public interest is generated on the matter. We are affording the general public a 45 day period to comment on the proposal. The public comment period begins - and ends-. All comments must be in writing and either postmarked or e-mailed prior to-. Please address your comments to:

Gordie Blum Office of Public Affairs U.S. EPA (P-19J)

77 W. Jackson Boulevard Chicago, Illinois 60604

Send e-mail comments to: blum.gordon@epamail.epa.gov Or for further information, call William Buller at (312) 886-4568, or 1-800-621-8431

Sincerely yours,

Gordie Blum Community Involvement Coordinator Ms. Linda Epich, Circulation Manager Marengo Public Library 200 South State Street Marengo, Illinois 60152

DRE-9J

Dear Ms. Epich:

Would you please add the enclosed documents to the information repository for Techalloy Company, Inc., and also sign the enclosed form and return to me with the self addressed envelope. The United States Environmental Protection Agency expects to public notice the availability of these documents in the near future.

Thank you for your cooperation. If you have any questions please call me at (312) 886-4568.

Sincerely,

William Buller, Project Manager Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division MI/WI Section

Enclosure

cc: Kevin Lesko, IEPA

bcc: Jacqueline Kline, ORC

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
MP 30(97					

1970-1995, Twenty-five years of Citizens Working for a Healthy Environment

Cof · McHenry County
Environment DEFENDERS

132 Cass St. Woodstock, Illinois 60098 (815)338-0393

k: 217/782-9891

April 13, 1995

Illinois Environmental Protection Agency Division of Water Pollution Control, Permit Section 2200 Churchill Rd. PO Box 19276 Springfield, IL 62794-9276

Re: NPDES Permit No. IL0070408 - Techalloy Co., Inc.

Dear Sirs:

The McHenry County Defenders, an environmental organization with more than 1,000 members who live in McHenry County, including many members who live near and use the Kishwaukee River, hereby requests a public hearing on the draft permit allowing Techalloy Company, Inc. of Union, IL to discharge treated groundwater into the South Branch of the Kishwaukee River. The South Branch of the Kishwaukee River flows to the northwest into the Kishwaukee River, a high-quality aquatic ecosystem that has been rated a "Class A" thream by the Illinois Natural History Survey. We are concerned about the environmental impact of the discharge on the water quality, fisheries, recreational uses, and habitat for rare and endangered species of the Kishwaukee River. There is great public interest in protecting this resource. Many of our concerns, and the concerns of our members who live near the river, can only be answered at a public hearing.

Specifically, we are concerned about the levels of chlorinated compounds that will be discharged into the river. We request that data be presented on the present level of these compounds found in the receiving stream at the proposed discharge site and in the Class A section of the Kishwaukee further downstream to assure that the non-degradation provisions of Sec. 302.105 of the Illinois Environmental Protection Agency's water quality standards not be violated.

we also request that information be made available to the public at this hearing regarding the procedure to be used to treat the groundwater prior to its discharge into the Kishwaukee. We are concerned that the reliability of the treatment procedure be adequate to ensure that monthly testing of the levels of chlorinated compounds in the treated water is sufficient.

The McHenry County Defenders is working to protect and restore the Kishwaukce River as a high-quality aquatic esource. We are deeply concerned about the impact any new sources of pollution may have on the water quality of the river, the fisheries, and habitat for the endangered river ofter, which has returned to the Kishwaukee River in recent years. We ask that you give our request for a public hearing on this permit a favorable response.

Sincerely.

Dr. Cynthia L. Skrukrud

Executive Director

cc: Techalloy Company, Inc., Village of Union, City of Marengo, Illinois Dept. of Conservation, Illinois Endangered Species Protection Board, McHenry County Conservation District, Boone County Conservation District, Sen. Dick Klemm, Rep. Cal Skinner, Congressman Don Manzullo

& Stender

I , Robert A. Shaw do hereby

certify that I am the publisher of Northwest Herald

a daily secular newspaper of general circulation

within the county(s) of McHenry and Kane

regularly published in the city of Crystal Lake

in the county of McHenry and state of Illinois, and which has been so published

for more than 12 months prior to the first publication of hereunto annexed notice or advertisement.

relating to the matter of

TECHALLOY CO / STATEMENT OF BASIS

was published in said newspaper 1 times, being 1 day

commencing

FEBRUARY 10, 1998

and ending

FEBRUARY 10, 1998

which were the dates of first and last insertions. I further certify that said newspaper is a newspaper as defined by the terms and conditions of Chapter 100, paragraph 1 et. seq., Illinois Revised Statutes 1981.

Given under my hand at Crystal Lake, Illinois

ACCT. #10926226

FEBRUARY-10, 1998

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publisher

Robert A. Sum

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